


ORIGINAL

J. William Ebert, Esq. (Nevada Bar. No. 2697)
LAW OFFICES OF J. WILLIAM EBERT
7690 West Sahara Avenue
Las Vegas, NV 89117
Tel.: 702.228.9400
Fax: 702.228.8228

Norman H. Beamer
Mark D. Rowland
Kevin P. B. Johnson
Renée L. Stasio
Ray R. Zado
Andrew Oliver
FISH & NEAVE
525 University Avenue
Palo Alto, California 94301
Tel.: 650.617.4000
Fax: 650.617.4090

FILED - RECEIVED
ENTERED - SERVED ON
COUNSEL/PARTIES OF RECORD
2003 APR -8 P 3:36
CLERK US DISTRICT COURT
DISTRICT OF NEVADA
BY  DEPUTY

Attorneys for Plaintiffs and Counterdefendants,
Harrah's Entertainment, Inc. and Harrah's Operating Company, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HARRAH'S ENTERTAINMENT, INC., and
HARRAH'S OPERATING COMPANY, INC.,

Plaintiffs/Counterdefendants,

v.

STATION CASINOS, INC., BOULDER
STATION, INC., PALACE STATION HOTEL &
CASINO, INC., SANTA FE STATION, INC.,
SUNSET STATION HOTEL & CASINO, INC.,
TEXAS STATION, INC., GREEN VALLEY
RANCH GAMING, LLC., and DOES 1-20,

Defendants/Counterclaimants.

) CV-S-01-0825-KJD-RJJ
)
) **DECLARATION OF RAY R. ZADO IN**
) **SUPPORT OF PLAINTIFFS'**
) **OPPOSITION TO DEFENDANTS'**
) **MOTION TO STRIKE ALL OR PARTS**
) **OF THE DECLARATION OF WILLIAM**
) **T. GEOGHEGAN**

204

I, Ray R. Zado, hereby declare as follows:

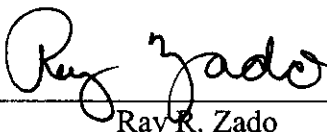
I am a member of the bar of the State of California and an associate at the law firm of Fish & Neave, counsel for Plaintiffs' Harrah's Entertainment, Inc. and Harrah's Operating Company, Inc. ("Harrah's"). I make this declaration in support of *Plaintiffs' Opposition to Defendants' Motion to Strike All or Parts of the Declaration of William T. Geoghegan*. I have personal knowledge as to the facts contained herein and could competently testify thereto.

1. I attended the deposition of Robert Moreland, which was taken April 11, 2002. Also in attendance at that deposition were Mark Rowland (counsel for Harrah's); W. Jackson Matney and Christopher Chalsen (counsel for Station Casinos, Inc., et. al.); Jim Kilby and Bart Lewin (expert consultants retained by Station Casinos, Inc., et. al.); and William T. Geoghegan (an expert consultant retained by Harrah's in connection with the above-captioned action).

2. At that deposition, prior to recordation of the transcript, Mr. Geoghegan was introduced to all five representatives of Station Casinos, Inc., et. al. as having been retained by Harrah's in connection with the above-captioned action.

3. Attached hereto as Exhibit 1 is a copy of the cover page, page 5, and the signature page of the transcript of the deposition of Robert Moreland, taken April 11, 2002. Page 5 of Exhibit 1 contains a list of individuals present at that deposition.

I declare under penalty of perjury, pursuant to the laws of the United States of America, that the foregoing is true and correct. Executed on April 7, 2003, at Palo Alto, California.



Ray R. Zado

1

Ex. 1

CONFIDENTIAL COPY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HARRAH'S ENTERTAINMENT, INC. and)
HARRAH'S OPERATING COMPANY, INC.,)

Plaintiffs-Counterclaim)
Defendants,)

vs.)

) CV-S-01-0825-PMP-RIJ

STATION CASINOS, INC., BOULDER)
STATION, INC., PALACE STATION)
HOTEL & CASINO, INC., SANTA FE)
STATION, INC., SUNSET STATION)
HOTEL & CASINO, INC. TEXAS)
STATION, INC., and DOES 1-20,)

Defendants-Counterclaim)
Plaintiffs.)

VOLUME 1

CONFIDENTIAL

DEPOSITION OF ROBERT MORELAND

Taken on Thursday, April 11, 2002

At 10:04 a.m.

At 530 Las Vegas Boulevard South
Las Vegas, Nevada

REPORTED BY: TRISHA SIMS, CRR NO. 587

CONFIDENTIAL

1 APPEARANCES:

2 For Defendants-Counterclaim Plaintiffs, Station
3 Casinos, Inc., Boulder Station, Inc., Palace Station
4 Hotel & Casino, Inc., Santa Fe Station, Inc., Sunset
5 Station, Inc. and Texas Station, LLC:

6 W. JACKSON MATNEY, ESQ.
7 ROBERT W. BUSBY, JR., ESQ.
8 Milbank, Tweed, Hadley & McCloy LLP
9 International Square Building
10 1825 Eye Street, N.W.
11 Washington, DC 20006
12 (202) 835-7500

13 CHRISTOPHER E. CHALSEN, ESQ.
14 Milbank, Tweed, Hadley & McCloy LLP
15 1 Chase Manhattan Plaza
16 New York, New York 10005
17 (212) 530-5000

18 I. LAWRENCE EPSTEIN, ESQ. (not present)
19 Beckley, Singleton, Jemison, Cobeaga & List
20 530 Las Vegas Boulevard South
21 Las Vegas, Nevada 89101

22 For International Game Technology and the deponent:

23 NICK SAROS, ESQ.
24 Kirkland & Ellis
25 777 South Figueroa Street
Los Angeles, California 90017
(213) 680-8658

For Harrah's Entertainment, Inc. and Harrah's Operating
Company, Inc.:

MARK D. ROWLAND, ESQ.
RAY R. ZADO, ESQ.
Fish & Neave
525 University Avenue
Palo Alto, California 94302
(650) 617-4000

Also Present:

BILL GEOGHEGAN
JIM KILBY
BART A. LEWIN

CERTIFICATE OF DEPONENT

PAGE	LINE	CHANGE	REASON
16	14	Sam's Town - Gold River	Correct Name
17	8	-National University 7/89 - 12/92	Reviewed Record
90	17	Chuck Hickey	Incorrect last name
94	19	IGT System Engineer Group	Correct title
95	2	that we had given them---	Correct who gave software
118	13	delete "of the" Should be Version Control System	Correct system definition
119	2	Change negative to native	Correct word
140	8-9-10	are collected each hour, and the drop meters	
		which all collected once per day when the	
		machines are dropped.	
164	3	SMB should read SMIB	Correct acronym

* * * * *

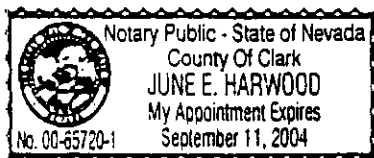
I, Robert Moreland, deponent herein, do hereby certify and declare the within and foregoing transcription to be my deposition in said action; that I have read, corrected and do hereby affix my signature to said deposition.

Robert E. Moreland
ROBERT MORELAND, Deponent

STATE OF NEVADA)
) SS:
COUNTY OF CLARK)

Subscribed and sworn to before me this

8th day of May, 2002.



June E. Harwood
Notary Public

1 CERTIFICATE OF REPORTER

2 STATE OF NEVADA)

) ss:

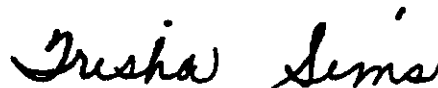
3 COUNTY OF CLARK)

4 I, Trisha Sims, a duly commissioned Notary
5 Public, Clark County, State of Nevada, do hereby
6 certify: That I reported the deposition of Robert
7 Moreland, commencing on Thursday, April 11, 2002, at
8 10:04 a.m.

9 That prior to being deposed, the witness was
10 duly sworn by me to testify to the truth. That I
11 thereafter transcribed my said shorthand notes into
12 typewriting and that the typewritten transcript is a
13 complete, true and accurate transcription of my said
14 shorthand notes.

15 I further certify that I am not a relative or
16 employee of counsel of any of the parties, nor a
17 relative or employee of the parties involved in said
18 action, nor a person financially interested in the
19 action.

20 IN WITNESS WHEREOF, I have set my hand in my
21 office in the County of Clark, State of Nevada, this
22 17th day of April, 2002.

23
24 

25 TRISHA SIMS, CCR NO. 587